1 Debra R. Torres-Reyes 1901 First Ave., Ste 152 2 San Diego, California 92101 (619) 237-7891 3 (619) 237-1156 Fax dtr4justice@aol.com 4 5 UNITED STATES DISTRICT COURT 6 SOUTHERN DISTRICT OF CALIFORNIA 7 (HONORABLE IRMA E. GONZALEZ) 8 9 **UNITED STATES OF AMERICA** CASE NO.: 07CR-3279-IEG 10 Plaintiff, NOTICE OF MOTIONS AND **MOTION FOR:** 11 1. **COMPEL DISCOVERY; AND** 12 IVAN FLORES, 2. LEAVE TO FILE FURTHER **MOTIONS** 13 Defendant. DATE: **JANUARY 14, 2008** 14 TIME: 2:00 P.M. 15 16 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AARON B. CLARK, 17 ASSISTANT UNITED STATES ATTORNEY PLEASE TAKE NOTICE that on Monday, January 14, 2008 at 2:00 p.m., or 18 as soon thereafter as counsel may be heard, the accused, Ivan Flores, by and 19 through his counsel, Debra R. Torres-Reyes, will move this Court for the items 20 listed in the attached motions and points and authorities in support of motion. 21 22 I. 23 **MOTIONS** The defendant, Ivan Flores, by and through his attorney, Debra R. Torres-24 Reyes, pursuant to the United States Constitution, the Federal Rules of Criminal 25 Procedure, and all other applicable statutes, case law and local rules, hereby 26 27 moves this court for an order to: 28 1) Compel Discovery; and,

2) Leave to File Further Motions

These motions are based upon the instant motions and notice of motions, memorandum of points and authorities, and all other materials that may come to the Court's attention at the time of hearing on these motions.

Dated: January 7, 2008

Respectfully submitted, s/ Debra R. Torres-Reyes Debra R. Torres-Reyes Attorney for Defendant Flores

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